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ATTORNEY GENERAL

STATE OF MINNESOTA
OFFICE OF THE ATTORNEY GENERAL

ST. PAUL 55155

November 15, 1984

US EPA RECORDS CENTER REGION 5



515356

ADDRESS REPLY TO:

ATTORNEY GENERAL'S OFFICE
POLLUTION CONTROL DIVISION
1935 WEST COUNTY ROAD B-2
ROSEVILLE, MN 55113
TELEPHONE: (612) 296-7342

Privileged

Dr. James W. Mercer
• GeoTrans
209 Elden St.
Suite 301
Herndon, VA 22070

Dear Dr. Mercer,

Re: Expert Testimony for Reilly Tar and Chemical Site Litigation

Transmitted with this letter are documents for your preparation in the above-referenced case. These are as follows:

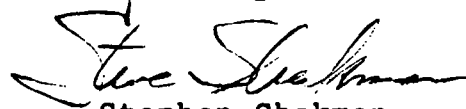
1. The second draft of the model documentation report by Stark and Hult (Bates nos. 9636585-702).
2. September 19, 1984 letter from Simonett to Stark with review comments pertaining to first draft of model documentation report (Bates nos. 9633897-9633898).
3. A street map for the St. Louis Park area, copied from a Hudson map book.
4. A set of maps showing well locations in each aquifer.
5. Supplemental tables of well and piezometer data (Bates nos. 9633844, 9633845, 9633847-9633849).
6. Plotted potentiometric surfaces for steady-state precalibration model runs 9-18; performed for negotiation purposes (Bates nos. 9636013-9636025).
7. Plotted potentiometric surfaces for steady-state calibrated model runs 19-28; (Bates nos. 9636026-9636029 and 9633773-9633778).
8. A mylar overlay with well locations for use with computer plots for runs 23-28.
9. Plotted potentiometric surfaces for seasonal (spring and summer) predictive model run 01-09; (Bates nos. 9636790-808).

10. November 3, 1984 memorandum from Simonett to file regarding use of steady-state rather than transient conditions for seasonal predicted runs (Bates nos. 9636711-719).
11. November 6, 1984 memorandum from Simonett to file regarding pumping rate assignments for wells in seasonal predictive runs (Bates nos. 9636703-710).
12. Mylar sheets of model area base map, model grid, high capacity well locations and observation well locations.
13. Complete input and output file listings for seasonal predictive run 05 (INSPR05, INSUM05, OTSPR05 and OTSUM05) and output for spring season predictive run 04 (OTSPR04).
14. Abbreviated (first few lines and pumping data) input files for seasonal predictive runs 01-03.
15. Complete input file with parameters used for calibrated steady-state simulations (PCATEST; used as base for runs 19-28).
16. Listings of pumping rates for each well for spring, fall and summer seasons, 1976-1980 and average (steady-state) well discharge rates for 1970-77. (Bates no. 9636584).
17. Data and analysis for Prairie du Chien-Jordan (PdC-J) aquifer pumping test on 2/3/84. W105 pumped; drawdown and recovery measured in W23 (Bates nos. 9627327-334).
18. Data and analysis for PdC-J pumping test on 5/10/84. SLP16 pumped; drawdown measured at SLP8 and recovery measured at SLP16 (Bates nos. 9633885-893 and 9636816-817).
19. Data and analysis for PdC-J pumping test on 5/11/84. SLP14 pumped; recovery measured in SLP14 (Bates no. 9636818).
20. Data and analysis for PdC-J pumping test on 5/11/84. SLP 6 pumped; recovery measured in SLP6 (Bates no. 9636819).
21. Data and analysis for PdC-J (and Ironton-Galesville) pumping test on 8/10/84 (Bates nos. 9636809-812).
22. Data and analysis for PdC-J pumping test on 9/25/84. W105 pumped; drawdown and recovery measured in W23 (Bates nos. 9636813-815).

23. November 7, 1984 memorandum from Simonett to file regarding revision of PAH analyses performed on Minikahda and American Hardware Mutual well samples by MDH in spring of 1984. (Bates nos. 9636720-722, 9633878-879, 9636723, and 9633877).

Please contact me at (612) 296-7216 or Mark Simonett at (612) 296-7390 if you have questions regarding these materials.

Sincerely,

A handwritten signature in dark ink, appearing to read "Steve Shakman", with a stylized, cursive script.

Stephen Shakman
Special Assistant
Attorney General

cc: Mark Simonett, MPCA
Chris Grundler, EPA, Washington, w/o Enclosures
Bill Sierks, DOJ, w/o Enclosures
Bob Leininger, EPA, Chicago, w/o Enclosures
Dave Crisman, MPCA, w/o Enclosures